

EXHIBIT 7

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**FOOD LION, LLC AND MARYLAND
AND VIRGINIA MILK PRODUCERS
COOPERATIVE ASSOCIATION,
INC.**

Plaintiffs,

v.

**DAIRY FARMERS OF AMERICA,
INC.,**

Defendant.

Case No. 1:20-cv-00442 (CCE)

**DEFENDANT DAIRY FARMERS OF AMERICA, INC.'S SECOND SET OF
REQUESTS FOR PRODUCTION TO PLAINTIFF MARYLAND & VIRGINIA
MILK PRODUCERS COOPERATIVE ASSOCIATION, INC.**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Dairy Farmers of America, Inc. ("DFA"), through its counsel, hereby requests the Plaintiffs produce for inspection and copying the following categories of Documents, electronically stored information ("ESI"), or things within their possession, care, custody, or control. Plaintiffs shall serve a written response to these requests and produce all such Documents, ESI, and things at the law offices of Womble Bond Dickson (US) LLP, 1 W. Fourth Street, Winston-Salem, NC 27101, within thirty (30) days from the date of service of these requests.

REQUEST NO. 25: Documents and Data supporting, contradicting, regarding, referring to, relating to, constituting, or pertaining to Your position that the Asset Sale is not subject to the failing company defense.

REQUEST NO. 26: Documents and Data that You or Your attorneys received from any non-party as a result of formal or informal discovery requests in connection with this action, including all Documents concerning such requests.

REQUEST NO. 27: Communications between You (or Your counsel) and any federal, state, or local agency, committee, department, or division, or any other federal, state, or local governmental authority or entity, concerning the subject matter of this action or Your claims in this action, including all documents concerning any such communications.

REQUEST NO. 28: Documents and Data supporting, contradicting, regarding, referring to, relating to, constituting, or pertaining to Your allegations that Plaintiffs are threatened by loss or damage as a result of the Asset Sale (*see, e.g.*, Complaint at ¶¶ 163, 172).

REQUEST NO. 29: Documents and Data supporting, contradicting, regarding, referring to, relating to, constituting, or pertaining to Your allegations that the Asset Sale will have the effect of substantially lessening competition (*see, e.g.*, Complaint at ¶¶ 102, 135, 159).

REQUEST NO. 30: Documents referring or relating to Your efforts to conduct due diligence into the existence of Your claim.

REQUEST NO. 35: Documents sufficient to identify Your efforts to reduce the cost of transportation of Raw Milk or Fluid Milk in, into, or from the Relevant Area.

REQUEST NO. 36: Communications with Your co-plaintiff or any non-party regarding competition for the purchasing of Raw Milk produced in the Relevant Area or competition for the purchasing of Raw Milk used to supply Fluid Milk processing plants located in the Relevant Area.

REQUEST NO. 37: Documents and Data supporting, contradicting, regarding, referring to, relating to, constituting, or pertaining to Your allegations that “the downstream market for the processing, co- packing, and delivery of fluid milk products to retailers like Food Lion and other customers” (Complaint at ¶ 10) constitutes a discrete product market.

REQUEST NO. 38: Documents and Data supporting, contradicting, regarding, referring to, relating to, constituting, or pertaining to Your allegation that the “relevant geographic market in this action for both the supply of raw milk and its processing and co-packing consists of the milk processing plants in North and South Carolina” (Complaint at ¶ 21).

REQUEST NO. 39: Data sufficient to show any transaction relating to Your purchase of Raw Milk from sources other than Your members, including purchases of Raw Milk produced inside or outside the Relevant Area to supply Your Fluid Milk processing facilities located in the Relevant Area, as well as purchases of Raw Milk produced in the Relevant Area to supply Your Fluid Milk processing facilities located outside the Relevant Area. The Data should include fields mutually agreed upon by the parties after

consultation, in good faith, to adequately capture information pertinent to such transactions, and should include information sufficient to understand the Data, such as a data dictionary.

DATED: August 31, 2020

Respectfully submitted,

**WOMBLE BOND DICKINSON (US)
LLP**

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**By Special Appearance*